

September 18, 2013



Office of the Secretary
Federal Communications Commission
Room 3-C438
445 12th St. SW
Washington, DC 20554

Received & Inspected
OCT 1 / 2013
FCC Mail Room

CAB-CC-1315
Docket # 06-181

Re: Self-Implementing Exemption from Closed Captioning

Dear FCC,

My name is Dave Andelman. My brother and I produce a TV series entitled Phantom Gourmet. It is dedicated to restaurant reviews in the Boston and New England area.

While we have been operating in Boston for some time, we have been trying to expand our operation and get our programming carried in other New England markets.

In Portland, Maine we have secured broadcast rights on a local TV station (WPFO). They are a small station that does not have local HD capacity. We produce all of our shows in HD and we close-caption the HD shows. Because we have to send an SD tape to the station in Maine and we do not have the capacity to close caption an SD tape, we are requesting the self-implementing exemption to closed captioning to allow us to have our shows broadcast without closed captioning on WPFO.

The Maine channel that we are trying to build does not currently generate any revenue. Therefore we would qualify under self-implementing exemptions #11 (cost of closed captioning would exceed 2% of our gross revenue) and #12 (annual channel revenue of less than \$3,000,000).

A copy of this letter is being sent to WPFO as proof to them that we have an exemption from closed captioning Phantom Gourmet.

David Andelman

Food and Fun. That's all we serve.